

FILED

DEC 13 2005

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

V.

ROBERT DOYLE MADDOX (1)

ANGELA GALEANA deMADDOX (2)

Defendants.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

CRIMINAL NO.

INDICTMENT

[Vio: COUNT ONE: 18 U.S.C. 1589 –  
Forced Labor; 18 U.S.C. 2 – Aiding and  
Abetting; COUNT TWO: 18 U.S.C. 1590 –  
Trafficking; 18 U.S.C. 2 – Aiding and  
Abetting; COUNT THREE: 18 U.S.C.  
1324(a)(1)(A)(ii) and (v)(II) and (B)(i)–  
Bringing in Alien; Aiding and Abetting]

W05CR240

THE GRAND JURY CHARGES:

COUNT ONE  
[18 U.S.C. 1589]

On or about January 13, 2004, in the Western District of Texas, Defendants,

**ROBERT DOYLE MADDOX,**  
and  
**ANGELA GALEANA deMADDOX,**

aided and abetted by each other, did knowingly provide or obtain the labor or services of a person by means of a scheme, plan, or pattern intended to cause the said person to believe that, if the said person did not perform such labor or services, that the said person would suffer serious harm or physical restraint, and by means of the abuse or threatened abuse of law or the legal process, in violation of Title 18, United States Code, Sections 1589, and Title 18, United States Code, Section 2.

COUNT TWO  
[18 U.S.C. 1590]

On or about January 13, 2004, in the Western District of Texas, Defendants,

**ROBERT DOYLE MADDOX,**  
and  
**ANGELA GALEANA deMADDOX,**

aided and abetted by each other, did knowingly recruit, harbor, transport, provide or obtain, by any means, a person for labor or services, in violation of Title 18, United States Code, Section 1590, and Title 18, United States Code, Section 2.

**COUNT THREE**  
**[8 U.S.C. 1324(a)(1)(A)(i) and (v)(II) and (B)(i)]**

On or about January 13, 2004, in the Western District of Texas, Defendants,

**ROBERT DOYLE MADDOX,**  
and  
**ANGELA GALEANA deMADDOX,**

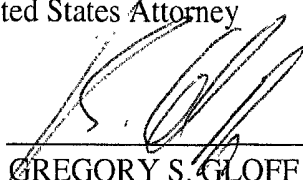
aided and abetted by each other, did knowingly or in reckless disregard of the fact that an alien had come to, entered, or remained in the United States, in violation of law, transported or moved or attempted to transport or move, such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and (v)(II) and (B)(i).

A TRUE BILL:

**SEALED DOCUMENT PURSUANT  
TO E-GOVERNMENT ACT OF 2002**

\_\_\_\_\_  
FOREPERSON

JOHNNY SUTTON  
United States Attorney

By:   
\_\_\_\_\_  
GREGORY S. GLOFF  
Assistant United States Attorney